

S

E

A

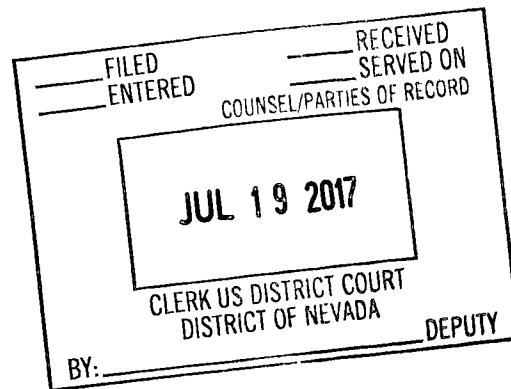
L

E

D

*Federal Public Defender
411 E. Bonneville Avenue, Suite 250
Las Vegas, NV 89101
(702) 388-6577
(702) 388-6261 (Fax)*

RENE L. VALLADARES
Federal Public Defender
Nevada State Bar No. 11479
MONIQUE KIRTLEY
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
Monique.Kirtley@fd.org



Attorney for Marco Antonio Reyes

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:17-cr-215-JAD-NJK

Plaintiff,

V.

MARCO ANTONIO REYES,

Defendant.

**SEALED STIPULATION TO
CONTINUE CHANGE OF PLEA
HEARING**
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre, Acting United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the United Stated of America, and Rene L. Valladares, Federal Public Defender, and Monique Kirtley, Assistant Federal Public Defender, counsel for Marco Antonio Reyes, that the Change of Plea Hearing currently scheduled on August 1, 2017, be vacated and continued to a date and time convenient to the Court, but no sooner than fourteen (14) days.

This Stipulation is entered into for the following reasons:

1. Defense counsel will be out of the jurisdiction at a conference on the currently scheduled change of plea hearing.

2. The defendant is in custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excusable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

This is the first request for a continuance of the change of plea hearing.

DATED this 19th day of July, 2017.

RENE L. VALLADARES
Federal Public Defender

MONIQUE KIRTLEY
Assistant Federal Public Defender

STEVEN W. MYHRE
Acting United States Attorney

By ELHAM ROOHANI
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARCO ANTONIO REYES,
Defendant.

Case No. 2:17-cr-215-JAD-NJK

ORDER

IT IS THEREFORE ORDERED that the change of plea hearing currently scheduled for Tuesday, August 1, 2017, be vacated and continued to August 21, 2017 at the hour of 11:00 a.m.

DATED this 20th day of July, 2017.

UNITED STATES DISTRICT JUDGE